

What You Need to Know About Protecting Personally Identifiable Information (PII)

PII stands for Personally Identifiable Information.

- *Definition:* Information which can be used to identify a person uniquely and reliably, including but not limited to name, social security number, address, telephone number, e-mail address, mother's maiden name, etc.**

What is Privacy Sensitive and Requires Protection

- **Financial, credit, and medical data**
- **Security clearance level**
- **Leave balances; types of leave used**
- **Home address and telephone numbers**
- **(including home web addresses)**
- **Social Security Number**
- **Mother's maiden name; other names used**
- **Drug test results and the fact of participation in rehabilitation programs**
- **Family data**
- **Religion, race, national origin**
- **Performance ratings**
- **Names of employees who hold government-issued travel cards, including card data**

BREACH NOTIFICATION PROCEDURES

- **The Navy is required to inform affected personnel within 10 days of discovering the breach.**
- **Detailed instructions on Breach Notification are being vetted and will be disseminated shortly and posted at <http://privacy.navy.mil>.**

WHAT KIND OF RECORDS IS THE NAVY KEEPING ON ME?

- Just ask and we will tell you!
- When soliciting PII information directly from you the Navy must provide you with a Privacy Act Statement (PAS) that:
- Identifies the authority for collecting the information
- the purpose; routine uses
- and whether disclosure of the information is voluntary or mandatory.

PRIVACY ACT SYSTEMS OF RECORDS NOTICES

- **With the passage of the Privacy Act, Executive Branch agencies had to identify “systems of records” that allowed for the collection of information that was retrieved by a person’s name and/or personal identifier.**
- **Today, the DON has over 220 approved Privacy Act systems of records which identify the kinds of records we can maintain on you. They are listed at <http://privacy.navy.mil>.**

COLLECTING PII

- **If you collect it - you must protect it!**
- **If in doubt - leave it out - do you really need the entire SSN or will the last 4 digits serve as a second qualifying identifier?**
- **Just because we've always done it that way doesn't mean this remains the best business practice.**

MORE BEST PRACTICES

- **When you receive an email and it contains personal information about another individual, do not forward that document to others without first assessing whether each recipient has an official need to know.**
- **Use training to educate your personnel on Privacy.**
 - **Ensure all newly assigned personnel receive orientation training on the Privacy Act so they fully understand their role in ensuring that personal information is protected from unauthorized disclosure.**
 - **Ensure all personnel receive refresher training once a year or more often should they be involved in a breach (loss) of personal information.**
 - **Ensure that supervisors take Privacy Act training 102 from <http://privacy.navy.mil>.**
 - **Ensure all personnel who deal with personal information contained in a Privacy Act system of records are properly trained on the systems notice and the safeguards addressed therein and the restrictions regarding access to the information.**

DISTRIBUTING INFORMATION

- **Under the Privacy Act, individuals who have an official need to know may have access to that portion of a record.**
- **If a disclosure is being made outside the Department of Defense, the systems notice must identify the recipient and why they are receiving it. For example, “To the Department of Veteran’s Affairs for the purpose of providing medical care.”**
- **All disclosures outside the Department of Defense require a disclosure accounting (I gave it to _____ for this purpose on _____).**

DON PA RESPONSIBILITIES

- **Upon written request, provide a copy of the record to the subject of the file.**
- **Maintain only accurate, timely, and complete information.**
- **When directly soliciting personal information, provide a PA Statement that addresses the authority for the collection, purpose for the collection, routine uses that will be made of the information, and whether collection is voluntary or mandatory.**

DON PA RESPONSIBILITIES

- **Follow the guidance set forth in the PA systems notice regarding release/withholding of information.**
- **With some exceptions provided for in the PA, make no disclosure of information without the record subject's written consent.**
- **When contracts are awarded that involve PA data, ensure the contract contains the appropriate Federal Acquisition Regulation (FAR) privacy clauses.**

WHAT ARE YOUR RESPONSIBILITIES?

- **As an employee, you play a very important role in assuring DON complies with the provisions of the Privacy Act. Accordingly,**
 - • **DO NOT collect personal data without authorization.**
 - • **DO NOT distribute or release personal information to other employees unless they have an official need-to-know.**

WHAT ARE YOUR RESPONSIBILITIES?

- **DO NOT** be afraid to challenge “anyone” who asks to see PA information for which you are responsible.
- **DO NOT** maintain records longer than permitted under records disposal.
- **DO NOT** destroy records before disposal requirements are met.
- **DO NOT** place unauthorized documents in PA systems of records.

WHAT ARE YOUR RESPONSIBILITIES?

- **DO NOT commingle information about different individuals in the same file.**
- **DO NOT transmit personal data without ensuring it is properly marked. Use 'FOR OFFICIAL USE ONLY - PRIVACY SENSITIVE.'**
- **DO NOT use interoffice envelopes to mail Privacy data.**
- **DO NOT place privacy data on shared drives, multi-access calendars, the Intranet or Internet that can be accessed by individuals who do not have an official need to know.**

WHAT ARE YOUR RESPONSIBILITIES?

- **DO NOT** create a new system of records without first consulting your Privacy Officer or CNO (DNS-36).
- **DO NOT** hesitate to offer recommendations on how to better effectively manage privacy data.
- **YOUR INSIGHT COUNTS!!! YOU DEDICATION TO PROTECTING PRIVACY IS PARAMOUNT TO OUR SUCCESS!!!**